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2 MARK D. BRADFORD, Bar No. 135538  
3 LAW OFFICES OF MARK D. BRADFORD  
4 PO BOX 2365  
5 WEST SACRAMENTO, CA 95691  
6 (916)551-1555

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9 ATTORNEY FOR DEBTOR[S]

10 UNITED STATES BANKRUPTCY COURT  
11 EASTERN DISTRICT OF CALIFORNIA

12 In Re:

Case No: 10-35809-A-7  
DC No. MDB-2

14 VARDAN KARAGYEZYAN

MOTION TO COMPEL  
ABANDONMENT OF  
PROPERTY OF THE ESTATE  
11 USC 554

17 \_\_\_\_\_ Debtor \_\_\_\_\_ /

Date: October 4, 2010  
Time: 9:00 a.m.  
Judge: McManus  
Dept: A, Rm 28, 7<sup>th</sup> Flr.

20 Debtor moves the Court as follows:

- 21 1. Debtor is self-employed doing business as New Life Shoe Repair, a sole
- 22 proprietorship.
- 23 2. Debtor Scheduled business assets and claimed them exempt.
- 24 3. Debtor's business activities are licensed and insured.
- 25 4. More details are provided by Debtor's Declaration and Exhibits Thereto.
- 26 5. Debtor's business is burdensome to the estate and his business assets are of
- 27 inconsequential value and benefit to the estate.
- 28

1                   **Wherefore, Debtor(s) Pray:**

2           1.     That the Court compel the Trustee to abandon Debtor's business and business  
3                   assets from the bankruptcy estate.

4           2.     For other relief the Court deems just and proper.

5  
6   Dated: August 23, 2010

Law Offices of Mark D. Bradford

7                   By: /s/\_\_\_\_\_  
8                   Mark D. Bradford, Attorney at Law